

PARKER POHL LLP

The motion to seal is GRANTED.

The Clerk of Court is requested to terminate the motion at Dkt. 94.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Via ECF Dated: October 1, 2024

Honorable Arun Subramanian
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September 27, 2024

Re: Milazzo v. Bank of New York Mellon, Case No. 23-cv-5427

Dear Judge Subramanian:

We represent Plaintiff Steven Milazzo. We write pursuant to the Court's Individual Practices Rule 11 and Section 8 of the Protective Order (ECF Doc. 30) to respectfully request leave to redact its memorandum of law and certain exhibits in support of Plaintiff's Motion for Leave to Amend Its Amended Complaint, filed today.

The Protective Order requires that any party seeking to file documents designated "Confidential" request leave to file them under seal. (See ECF Doc. 30, § 8) In an email exchange on September 26 and 27, 2024, my colleague Wendy Tannenbaum asked for Defendant's counsel's consent to file on the public docket excerpts from deposition testimony that quote from or describe the contents of exhibits that have been marked Confidential, and which identify certain non-party individuals. Counsel declined to consent. We have notified Defendant that, pursuant to Rule 11(C)(i) of the Court's Individual Practices, Defendant must submit a letter explaining the need for the redactions.

Accordingly, Plaintiff respectfully requests leave (a) to redact quotations and descriptive references to the confidential documents in the memorandum and Exhibits A, B, C, and D, and (b) to identify certain non-party individuals as Employee A, Employee B, and Employee C, and to file unredacted versions of these documents under seal.

Thank you for the Court's consideration of this submission.

Respectfully submitted,

/s/ Shelly L. Friedland
Shelly L. Friedland